

REMARKS

The Examiner rejected claims 2-4, 6-15, 17-25, 27-29, 31-41 and 43-55 under 35 U.S.C. §103(a) as allegedly being unpatentable over US Patent Application Publication No. 2003/0033317 to Ziglin in view of US Patent No. 6,463,585 to Hendricks et al.

Applicants respectfully traverse the §103(a) rejections with the following arguments.

35 U.S.C. §103(a)

The Examiner rejected claims 2-4 under 35 U.S.C. §103(a) as allegedly being unpatentable over U.S. Patent Application Publication No. 2003/0033317 to Ziglin in view of U.S. Patent No. 6,463,585 to Hendricks et al.

Applicants respectfully contend that claims 4 is not unpatentable over Ziglin in view of Hendricks, because Ziglin in view of Hendricks does not teach or suggest each and every feature of claim 4. For example, Ziglin in view of Hendricks does not teach or suggest the feature: “said system comprising a non-SAP bridge program adapted to generate the Aspect file through use of data derived from a dataset and to transmit the Aspect file to the SAP business information system”.

The Examiner cites alleges that in FIG. 12 of Ziglin: enterprise solutions applications 132 is a SAP business information system, layer program 118 is a non-SAP bridge program, database 96 comprises a dataset, and database 134 comprises an Aspect file. In response and accepting the preceding allegations by the Examiner for the sake of argument, Applicants make the following two arguments.

Applicants’ first argument is that Ziglin does not teach or suggest that the layer program 118 is adapted to generate an Aspect file in database 134 through use of date derived from the database 96, as required by claim 4. Ziglin teaches in [0057] that “application layer 118 facilitates communications between web applications 112 and database 96”. Ziglin teaches in [0061] that “application layer 118 may be used to facilitate communications between web applications 112 on web server 114 and enterprise database 134”. However, Ziglin does not

teach or suggest that application layer 118 facilitates communications between database 96 and database 134. In other words, the only interface functionality possessed by the application layer 118 is the functionality of facilitating communication between web applications 112 and either database 96 or database 134.

Applicants acknowledge that Ziglin teaches in [0009] that “a layering application program can be used to convert data from a first database format to a second database format”. However, a teaching of converting the format of data (from a first to second database format) is not a teaching of using data in a first database to generate data in a second database. Indeed, there is absolutely no disclosure by Ziglin that the application layer 118 uses data in database 96 to generate data in database 134.

Applicants’ second argument is that Ziglin does not teach or suggest that the layer program 118 is adapted to transmit the Aspect file from the database 134 to the enterprise solutions applications 132, as required by claim 4. As explained *supra*, the only interface functionality possessed by the application layer 118 is the functionality of facilitating communication between web applications 112 and either database 96 or database 134. There is absolutely no disclosure by Ziglin that the application layer 118 facilitates communication between the database 134 and the enterprise solutions applications 132, and Ziglin most certainly does not disclose that the layer program 118 is adapted to transmit the Aspect file to the enterprise solutions applications 132. In FIG. 12, the layering program 118 is not even connected to the enterprise solutions applications 132.

Based on the preceding arguments, Applicants respectfully maintain that claim 4 is not unpatentable over Ziglin in view of Hendricks, and that claim 4 is in condition for allowance. Since claims 2 and 3 depend from claim 4, Applicants contend that claims 2 and 3 are likewise in condition for allowance.

In addition with respect to claim 3, Ziglin in view of Hendricks does not teach or suggest the feature: “wherein the dataset is a SAP-formatted dataset”. The Examiner alleges that the database 96 comprises the dataset of claim 4 (and therefore also of claim 3 which depends from claim 4). However, it is the database 134, and not the database 96, that contains the data that is compatible with the enterprise solution applications 132. Thus, perhaps the database 134 may contain SAP-formatted data. However, the database 96 is not in a format that may be used by the enterprise solution applications 132. See Ziglin, [0060] (“ the data in relational database 96 preferably is converted to the new enterprise database 134 format ”). Therefore, there is no disclosure in Ziglin that the database 96 contains any SAP-formatted data.

Applicants further note that the Examiner has not provided any citation allegedly showing that database 96 may contain SAP-formatted data.

35 U.S.C. §103(a): Claims 6-15

The Examiner rejected claims 6-15 under 35 U.S.C. §103(a) as allegedly being unpatentable over U.S. Patent Application Publication No. 2003/0033317 to Ziglin in view of U.S. Patent No. 6,463,585 to Hendricks et al.

Applicants respectfully contend that claim 10 is not unpatentable over Ziglin in view of Hendricks, because Ziglin in view of Hendricks does not teach or suggest each and every feature of claim 10. For example, Ziglin in view of Hendricks does not teach or suggest the feature: “said system comprising a non-SAP bridge program adapted to generate the Aspect file through use of data derived from a dataset and to transmit the Aspect file to the SAP business information system”, based on the same arguments presented *supra* in relation to claim 4.

In addition, Ziglin in view of Hendricks does not teach or suggest the feature: “an Aspect file having rollup records”. The Examiner also alleges that Hendricks, col. 70, lines 40-56 (in conjunction with FIG. 29) discloses rollup records. In response, Applicants notes that Hendricks teaches that step 430 of FIG. 29 establishes “the number of programs watched for a given time slot”. Applicants acknowledge that if Hendricks were to teach generating a record of an Aspect file containing a field of the “time slot” together with an associated field of “the number of programs watched for a given time slot”, such a teaching would be a teaching of a file having a rollup record. However, Hendricks does not teach that the time slot and the associated number of programs watched are stored within a file. Hendricks merely teaches that “the number of programs watched for a given time slot” is a computed quantity that is used only as a counter to implement the building of a programs watched matrix in step 432 of FIG. 29. Hendricks does not teach that the time slot and the associated number of programs watched are stored within a

file, as required by claim 10.

Moreover, Ziglin in view of Hendricks does not teach or suggest the feature: “said dataset having a keygroup, wherein to generate the Aspect file includes to roll up a portion of the dataset with respect to the keygroup, wherein each rollup record has a rollup field and a quantity field, wherein the rollup field stores a rollup keyvalue of the keygroup, and wherein the quantity field stores the number of dataset records that have the same rollup keyvalue”. In response, Applicants note that the “time slot” in Hendricks, col. 70, lines 40-56 might be relevant to claim 10 with the “time slot” being a keygroup and the associated quantity field containing “the number of programs watched for a given time slot”. However, claim 10 requires that data to be rolled up (time slots and programs watched over a period of time in Hendricks) be stored in the dataset (alleged by the Examiner to be in database 96 allegedly in Ziglin) and the rollup field to be stored (number of periods watched for each time slot allegedly in Hendricks) in the Aspect file (alleged by the Examiner to be in database 134). The Examiner has provided no motivation from the prior art as to why it would be obvious to have the data to be rolled up stored in database 96, and the rollup record stored in database 134. In effect, **the Examiner has not provided any argument to support the alleged obviousness of the preceding modification of Ziglin by the alleged teaching of Hendricks.** Therefore, Applicants respectfully contend that the Examiner has not established a *prima facie* case of obviousness in relation to claim 10.

Based on the preceding arguments, Applicants respectfully maintain that claim 10 is not unpatentable over Ziglin in view of Hendricks, and that claim 10 is in condition for allowance. Since claims 6-9 and 11-15 depend from claim 10, Applicants contend that claims 11-15 are likewise in condition for allowance.

In addition with respect to claim 6, Ziglin in view of Hendricks does not teach or suggest the feature: “wherein the bridge program is further adapted to cause the rollup records in the generated Aspect file to be sorted with respect to the keygroup”. The Examiner’s citation of FIGS. 12 and 15 of Hendricks is not persuasive, because Hendricks does not teach anywhere the sorting of rollup records. The Examiner’s citation of FIGS. 4 and 29 of Ziglin is irrelevant, since Ziglin does not teach rollup records. Moreover, the Examiner has not provided an argument to support the alleged obviousness of the preceding modification of Ziglin by the alleged teaching of Hendricks.

In addition with respect to claim 8, Ziglin in view of Hendricks does not teach or suggest the feature: “wherein the dataset is a SAP-formatted dataset” based on the same arguments presented *supra* in relation to claim 3.

In addition with respect to claim 9, Ziglin in view of Hendricks does not teach or suggest the feature: “wherein the bridge program is further adapted to generate a trace file that includes a representative rollup keyvalue of the keygroup and a pointer that points to a portion of the

dataset, said portion being correlated with the representative rollup keyvalue”. The Examiner argues that “the bridge program is further adapted to generate a trace file [Hendricks: target sequence] that includes a representative rollup keyvalue [Hendricks: highest priority weighted group] of the keygroup and a pointer that points to a portion of the dataset, said portion being correlated with the representative rollup keyvalue [Hendricks: See column 70, line 57 et seq.]” In response, Applicants do not find the phrase “target sequence” in Hendricks, col. 70, line 57 et seq., but do find “advertising target sequencing 374 of FIG. 28” in Hendricks, col. 71, lines 1-2. However, reference numeral 374 in FIG. 28 of Hendricks refers to the sequence of steps in the flow chart of FIG. 28, which is unrelated to the preceding feature of claim 9 and most certainly does not disclose, for example, the “trace file” and “pointer” of the preceding feature of claim 9. In effect, the Examiner has not explained how the so-called “target sequence” teaches or suggests the preceding feature of claim 9.

In addition with respect to claim 12, Ziglin in view of Hendricks does not teach or suggest the feature: “wherein to identify the select records includes to accept as input a first date and a second date, wherein the first date is earlier than the second date, and wherein the selection rules do not permit identifying as a select record any record of the dataset having an effective date that is earlier than the first date or later than the second date”. The Examiners argument of combining Hendricks, col. 40, lines 44-56 with Hendricks, col. 70, lines 40 - col. 71, line 10 is not persuasive, because these respective portions of Hendricks are not combinable with respect to the preceding feature of claim 12. Hendricks, col. 40, lines 44-56 pertains to the scheduling of data traffic, whereas Hendricks, col. 70, lines 40 - col. 71, line 10 pertains to the organization

and weighting of watched program information. The preceding combining, by the Examiner, of said unrelated portions of Hendricks is not persuasive, and is not unlike applying the scheduling of airplane traffic to making a decision as to what the next offensive play might be in a football game.

In addition with respect to claims 14-15, Ziglin in view of Hendricks does not teach or suggest the features: “wherein the report relates to procurement data, and wherein the rollup records include the procurement data” (claim 14); and “wherein the procurement data is selected from the group consisting of purchase order data, invoice data, and a combination thereof” (claim 15). The Examiner argues that the preceding feature is disclosed in “the Background, Summary, and Detailed Descriptions of both Ziglin and Hendricks”. In not being able to cite anything specific in Ziglin and/or Hendricks, Applicants conclude that the Examiner was unable to find the preceding features of claims 14-15 in Ziglin and/or Hendricks. Moreover, the Examiner did not offer evidence from the prior art to support the preceding modification of Ziglin by Hendricks. Therefore, Applicants respectfully contend that the Examiner has not established a *prima facie* case of obviousness in relation to claims 14-15.

35 U.S.C. §103(a): Claims 17-25

The Examiner rejected claims 17-25 under 35 U.S.C. §103(a) as allegedly being unpatentable over U.S. Patent Application Publication No. 2003/0033317 to Ziglin in view of U.S. Patent No. 6,463,585 to Hendricks et al.

Applicants respectfully contend that claim 23 is not unpatentable over Ziglin in view of Hendricks, because Ziglin in view of Hendricks does not teach or suggest each and every feature of claim 23. For example, Ziglin in view of Hendricks does not teach or suggest the feature: “said system comprising at least one non-SAP bridge program adapted to respectively generate the N Aspect files through use of data derived from select records $[S]_1, [S]_2, \dots, [S]_N$ of N datasets D_1, D_2, \dots, D_N , respectively, and to transmit the N Aspect files to the SAP business information system”, based on the same arguments presented *supra* in relation to claim 4.

In addition, Ziglin in view of Hendricks does not teach or suggest the feature: “N Aspect files A_1, A_2, \dots, A_N respectively having rollup records $[R]_1, [R]_2, \dots, [R]_N$ ”, based on the same arguments presented *supra* in relation to claim 10 for the feature “an Aspect file having rollup records”.

In addition, Ziglin in view of Hendricks does not teach or suggest the feature: “said select records $[S]_1, [S]_2, \dots, [S]_N$ having a common keygroup, wherein to generate the N Aspect files comprises, for $I = 1, 2, \dots$, and N: ...to roll up the select records $[S]_i$ with respect to the common keygroup, wherein the rollup records $[R]_i$ corresponding to $[S]_i$ have a rollup field and a quantity field, wherein the rollup field stores a rollup keyvalue of the select records $[S]_i$, wherein the quantity field stores the number of select records of $[S]_i$ that have the same rollup keyvalue”, based on the same arguments presented *supra* in relation to claim 10 for a similar feature.

Based on the preceding arguments, Applicants respectfully maintain that claim 23 is not unpatentable over Ziglin in view of Hendricks, and that claim 23 is in condition for allowance. Since claims 17-22 and 24-25 depend from claim 23, Applicants contend that claims 17-22 are likewise in condition for allowance.

In addition with respect to claim 18, Ziglin in view of Hendricks does not teach or suggest the feature: “wherein a first dataset of the N datasets is a SAP-formatted dataset” based on the same arguments presented *supra* in relation to claim 3.

In addition with respect to claim 20, Ziglin in view of Hendricks does not teach or suggest the feature: “N bridge programs” combined with “said N at least 2” from claim 23. The Examiner identified only one bridge program in Ziglin, namely the layering program 118. In fact, the Examiner has not even addressed the issue of the preceding feature of claim 20. Therefore, Applicants respectfully contend that the Examiner has not established a *prima facie* case of obviousness in relation to claim 20.

In addition with respect to claim 21, Ziglin in view of Hendricks does not teach or suggest the feature: “wherein the datasets D_1, D_2, \dots, D_N have formats F_1, F_2, \dots, F_N , respectively, and wherein the at least one bridge program consists of one bridge program having logical paths L_1, L_2, \dots, L_N respectively keyed to the formats F_1, F_2, \dots, F_N for respectively generating the Aspect files A_1, A_2, \dots, A_N .” combined with “said N at least 2” from claim 23. The Examiner has not even addressed the issue of the preceding feature of claim 21. Therefore, Applicants

respectfully contend that the Examiner has not established a *prima facie* case of obviousness in relation to claim 21.

In addition with respect to claims 24-25, Ziglin in view of Hendricks does not teach or suggest the features: “wherein the report relates to procurement data, and wherein the rollup records $[R]_1, [R]_2, \dots, [R]_N$ include the procurement data” (claim 24); and “wherein the procurement data is selected from the group consisting of purchase order data, invoice data, and a combination thereof” (claim 25), based on the same arguments presented *supra* in relation to claims 14-15.

35 U.S.C. §103(a): Claims 27-29

The Examiner rejected claims 27-29 under 35 U.S.C. §103(a) as allegedly being unpatentable over U.S. Patent Application Publication No. 2003/0033317 to Ziglin in view of U.S. Patent No. 6,463,585 to Hendricks et al.

Applicants respectfully contend that claim 29 is not unpatentable over Ziglin in view of Hendricks, because Ziglin in view of Hendricks does not teach or suggest each and every feature of claim 29. For example, Ziglin in view of Hendricks does not teach or suggest the feature: “executing a non-SAP bridge program, said executing including: generating the Aspect file through use of data derived from a dataset; and transmitting the Aspect file to the SAP business information system”, based on the same arguments presented *supra* in relation to claim 4.

In addition with respect to claim 8, Ziglin in view of Hendricks does not teach or suggest the feature: “wherein the dataset is a SAP-formatted dataset” based on the same arguments presented *supra* in relation to claim 3.

Based on the preceding arguments, Applicants respectfully maintain that claim 29 is not unpatentable over Ziglin in view of Hendricks, and that claim 29 is in condition for allowance. Since claims 27 and 28 depend from claim 29, Applicants contend that claims 27 and 28 are likewise in condition for allowance.

35 U.S.C. §103(a): Claims 31-41

The Examiner rejected claims 31-41 under 35 U.S.C. §103(a) as allegedly being unpatentable over U.S. Patent Application Publication No. 2003/0033317 to Ziglin in view of U.S. Patent No. 6,463,585 to Hendricks et al.

Applicants respectfully contend that claim 35 is not unpatentable over Ziglin in view of Hendricks, because Ziglin in view of Hendricks does not teach or suggest each and every feature of claim 35. For example, Ziglin in view of Hendricks does not teach or suggest the feature: “an Aspect file having rollup records”, based on the same arguments presented *supra* in relation to claim 10.

In addition, Ziglin in view of Hendricks does not teach or suggest the feature: “said generating comprising rolling up a portion of the dataset with respect to the keygroup, wherein each rollup record has a rollup field and a quantity field, wherein the rollup field stores a rollup keyvalue of the keygroup, and wherein the quantity field stores the number of dataset records that have the same rollup keyvalue”, based on the same arguments presented *supra* in relation to claim 10 for a similar feature.

Based on the preceding arguments, Applicants respectfully maintain that claim 35 is not unpatentable over Ziglin in view of Hendricks, and that claim 35 is in condition for allowance. Since claims 31-34 and 36-41 depend from claim 35, Applicants contend that claims 31-34 and 36-41 are likewise in condition for allowance.

In addition with respect to claim 31, Ziglin in view of Hendricks does not teach or suggest the feature: “wherein generating the Aspect file includes causing the rollup records in the

generated Aspect file to be sorted with respect to the keygroup”, based on the same arguments presented *supra* in relation to claim 6.

In addition with respect to claim 33, Ziglin in view of Hendricks does not teach or suggest the feature: “wherein the dataset is a SAP-formatted dataset”, based on the same arguments presented *supra* in relation to claim 3.

In addition with respect to claim 34, Ziglin in view of Hendricks does not teach or suggest the feature: “generating a trace file that includes a representative rollup keyvalue of the keygroup and a pointer that points to a portion of the dataset, said portion being correlated with the representative rollup keyvalue”, based on the same arguments presented *supra* in relation to claim 9.

In addition with respect to claim 37, Ziglin in view of Hendricks does not teach or suggest the feature: “said identifying including accepting as input a first date and a second date, said first date earlier than said second date, said selection rules not permitting said identifying to identify as a select record any record of the dataset having an effective date that is earlier than the first date or later than the second date”, based on the same arguments presented *supra* in relation to claim 7.

In addition with respect to claims 39-40, Ziglin in view of Hendricks does not teach or suggest the features: “wherein the report relates to procurement data, and wherein the rollup

records include the procurement data” (claim 24); and “wherein the procurement data is selected from the group consisting of purchase order data, invoice data, and a combination thereof” (claim 25), based on the same arguments presented *supra* in relation to claims 14-15.

In addition with respect to claim 41, Ziglin in view of Hendricks does not teach or suggest the feature: “making a query to sum over the quantity field for a subset of the rollup records of the Temp file”. The Examiner argues: “making a query to sum over the quantity field for a subset of the rollup records of the Temp file [Hendricks: Column 70, line 40 - Column 71, line 10]”. In response, Applicants respectively contend that there is no disclosure of said “making a query to sum over the quantity field” in Hendricks, col. , line 40 - col. 71, line 10”. If the Examiner is referring to the disclosure of “a sum of squares algorithm may be used to determine the weighting” in Hendricks, cols. 59-60, Applicants would point out that a sum of squares algorithm to determine the weighting is totally unrelated to “making a query to sum over the quantity field”, as is well known in the art of applied mathematics.

35 U.S.C. §103(a): Claims 43-52

The Examiner rejected claims 43-52 under 35 U.S.C. §103(a) as allegedly being unpatentable over U.S. Patent Application Publication No. 2003/0033317 to Ziglin in view of U.S. Patent No. 6,463,585 to Hendricks et al.

Applicants respectfully contend that claim 49 is not unpatentable over Ziglin in view of Hendricks, because Ziglin in view of Hendricks does not teach or suggest each and every feature of claim 49. For example, Ziglin in view of Hendricks does not teach or suggest the feature: “N Aspect files A_1, A_2, \dots, A_N respectively having rollup records $[R]_1, [R]_2, \dots, [R]_N$, said N at least 2, said method comprising providing N datasets D_1, D_2, \dots, D_N having a common keygroup, and for $I = 1, 2, \dots, \text{and } N$ executing a non-SAP bridge program, including: identifying select records $[S]_i$ of the dataset D_i , said identifying in accordance with selection rules applied to D_i ; and rolling up the select records $[S]_i$ with respect to the common keygroup, wherein the rollup records $[R]_i$ corresponding to $[S]_i$ have a rollup field and a quantity field, wherein the rollup field stores a rollup keyvalue of the select records $[S]_i$, wherein the quantity field stores the number of select records of $[S]_i$ that have the same rollup keyvalue, and wherein the SAP business information system comprises a SAP Executive Information System (EIS), based on the same arguments presented *supra* in relation to claim 23.

Based on the preceding arguments, Applicants respectfully maintain that claim 49 is not unpatentable over Ziglin in view of Hendricks, and that claim 49 is in condition for allowance. Since claims 43-48 and 50-52 depend from claim 49, Applicants contend that claims 43-48 and 50-52 are likewise in condition for allowance.

In addition with respect to claim 44, Ziglin in view of Hendricks does not teach or suggest the feature: “wherein the dataset is a SAP-formatted dataset”, based on the same arguments presented *supra* in relation to claim 3.

In addition with respect to claim 46, Ziglin in view of Hendricks does not teach or suggest the feature: “N bridge programs” combined with “said N at least 2” from claim 49, based on the same arguments presented *supra* in relation to claim 20.

In addition with respect to claim 47, Ziglin in view of Hendricks does not teach or suggest the feature: “wherein the datasets D_1, D_2, \dots, D_N have formats F_1, F_2, \dots, F_N , respectively, and wherein the at least one bridge program consists of one bridge program having logical paths L_1, L_2, \dots, L_N respectively keyed to the formats F_1, F_2, \dots, F_N for respectively generating the Aspect files A_1, A_2, \dots, A_N ” combined with “said N at least 2” from claim 49, based on the same arguments presented *supra* in relation to claim 21.

In addition with respect to claims 50-51, Ziglin in view of Hendricks does not teach or suggest the features: “wherein the report relates to procurement data, and wherein the rollup records $[R]_1, [R]_2, \dots, [R]_N$ include the procurement data” (claim 50); and “wherein the procurement data is selected from the group consisting of purchase order data, invoice data, and a combination thereof” (claim 51), based on the same arguments presented *supra* in relation to claims 14-15.

In addition with respect to claim 52, Ziglin in view of Hendricks does not teach or suggest the feature: “making a query to sum over the quantity field for a subset of the rollup records of the Temp file”, based on the same arguments presented *supra* in relation to claim 41.

35 U.S.C. §103(a): Claim 53

The Examiner rejected claim 53 under 35 U.S.C. §103(a) as allegedly being unpatentable over U.S. Patent Application Publication No. 2003/0033317 to Ziglin in view of U.S. Patent No. 6,463,585 to Hendricks et al.

Applicants respectfully contend that claim 53 is not unpatentable over Ziglin in view of Hendricks, because Ziglin in view of Hendricks does not teach or suggest each and every feature of claim 53. For example, Ziglin in view of Hendricks does not teach or suggest the feature: “said program code comprising a non-SAP bridge program adapted to generate the Aspect file through use of data derived from a dataset and to transmit the Aspect file to the SAP business information system”, based on the same arguments presented *supra* in relation to claim 4.

Based on the preceding arguments, Applicants respectfully maintain that claim 53 is not unpatentable over Ziglin in view of Hendricks, and that claim 53 is in condition for allowance.

35 U.S.C. §103(a): Claim 54

The Examiner rejected claim 54 under 35 U.S.C. §103(a) as allegedly being unpatentable over U.S. Patent Application Publication No. 2003/0033317 to Ziglin in view of U.S. Patent No. 6,463,585 to Hendricks et al.

Applicants respectfully contend that claim 54 is not unpatentable over Ziglin in view of Hendricks, because Ziglin in view of Hendricks does not teach or suggest each and every feature of claim 54. For example, Ziglin in view of Hendricks does not teach or suggest the feature: “said program code comprising a non-SAP bridge program adapted to generate the Aspect file through use of data derived from a dataset and to transmit the Aspect file to the SAP business information system”, based on the same arguments presented *supra* in relation to claim 4.

In addition, Ziglin in view of Hendricks does not teach or suggest the feature: “an Aspect file having rollup records”, based on the same arguments presented *supra* in relation to claim 10.

Moreover, Ziglin in view of Hendricks does not teach or suggest the feature: “said dataset having a keygroup, wherein to generate the Aspect file includes to roll up a portion of the dataset with respect to the keygroup, wherein each rollup record has a rollup field and a quantity field, wherein the rollup field stores a rollup keyvalue of the keygroup, and wherein the quantity field stores the number of dataset records that have the same rollup keyvalue”, based on the same arguments presented *supra* in relation to claim 10.

Based on the preceding arguments, Applicants respectfully maintain that claim 54 is not unpatentable over Ziglin in view of Hendricks, and that claim 54 is in condition for allowance.

35 U.S.C. §103(a): Claim 55

The Examiner rejected claim 55 under 35 U.S.C. §103(a) as allegedly being unpatentable over U.S. Patent Application Publication No. 2003/0033317 to Ziglin in view of U.S. Patent No. 6,463,585 to Hendricks et al.

Applicants respectfully contend that claim 55 is not unpatentable over Ziglin in view of Hendricks, because Ziglin in view of Hendricks does not teach or suggest each and every feature of claim 55. For example, Ziglin in view of Hendricks does not teach or suggest the feature: “said program code comprising at least one non-SAP bridge program adapted to respectively generate the N Aspect files through use of data derived from select records $[S]_1, [S]_2, \dots, [S]_N$ of N datasets D_1, D_2, \dots, D_N , respectively, and to transmit the N Aspect files to the SAP business information system”, based on the same arguments presented *supra* in relation to claim 4.

In addition, Ziglin in view of Hendricks does not teach or suggest the feature: “N Aspect files A_1, A_2, \dots, A_N respectively having rollup records $[R]_1, [R]_2, \dots, [R]_N$ ”, based on the same arguments presented *supra* in relation to claim 10 for the feature “an Aspect file having rollup records”.

In addition, Ziglin in view of Hendricks does not teach or suggest the feature: “said select records $[S]_1, [S]_2, \dots, [S]_N$ having a common keygroup, wherein to generate the N Aspect files comprises, for $I = 1, 2, \dots$, and N: ...to roll up the select records $[S]_i$ with respect to the common keygroup, wherein the rollup records $[R]_i$ corresponding to $[S]_i$ have a rollup field and a quantity field, wherein the rollup field stores a rollup keyvalue of the select records $[S]_i$, wherein the quantity field stores the number of select records of $[S]_i$ that have the same rollup keyvalue”, based on the same arguments presented *supra* in relation to claim 10 for a similar feature.

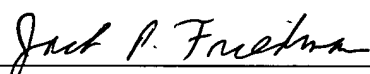
Based on the preceding arguments, Applicants respectfully maintain that claim 55 is not unpatentable over Ziglin in view of Hendricks, and that claim 55 is in condition for allowance.

CONCLUSION

Based on the preceding arguments, Applicants respectfully believe that all pending claims and the entire application meet the acceptance criteria for allowance and therefore request favorable action. If the Examiner believes that anything further would be helpful to place the application in better condition for allowance, Applicants invites the Examiner to contact Applicants' representative at the telephone number listed below. The Director is hereby authorized to charge and/or credit Deposit Account No. 09-0457.

Date: 03/24/2005

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